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Attorneys for Defendants
CLAIRE'S BOUTIQUES, INC.
AND CLAIRE'S HOLDINGS, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

KILA SMITH,

 Plaintiff,

 v.

CLAIRE'S BOUTIQUES, INC. a Michigan
 Corporation; CLAIRE'S HOLDINGS, LLC, a
 Limited Liability Company; RYAN VERO, an
 individual; and DOES 1 through 100,
 inclusive,

Defendants.

Case No.

**DECLARATION OF DANIELLE CLARK
 IN SUPPORT OF DEFENDANTS'
 NOTICE OF REMOVAL**

(Filed concurrently with Notice of Removal;
 Declarations of Michele Reilly and Adam Y.
 Siegel; Civil Case Cover Sheet; Notice of
 Interested Parties; and Corporate Disclosure
 Statement)

Complaint Filed: 08/05/2022
 Trial Date: TBD

I, DANIELLE CLARK, declare as follows:

1. I am over the age of 18 and competent to testify. The following facts are based on my personal knowledge or based on my personal review of records kept in the course of regularly conducted business activities by Defendant Claire's Boutiques, Inc. and Defendant Claire's Holdings, LLC (hereinafter also referred to as "Defendants"). If called as a witness, I can and will competently testify hereto.

2. I submit this declaration in support of Defendants' Notice of Removal.

4. In the course and scope of my employment as Director, Human Resources Business Partner Field Functions, I have access to and regularly review Defendants' payroll data and personnel records for current and former employees. Furthermore, I have access to and regularly review payroll data and records that are created, maintained, regularly updated, and kept by Defendants in the regular and ordinary course of business. Based on my role as Director, Human Resources Business Partner Field Functions, I have access to the payroll and personnel records of Plaintiff Kila Smith ("Plaintiff"). Based on my review of Plaintiff's payroll records, which were created, maintained, and kept by Defendant in the regular and ordinary course of business, I understand that throughout Plaintiff's employment for Defendant, she worked anywhere from 15-37 hours per week and earned \$19.85 per hour. Based on my review of Plaintiff's personnel records, which were also created, maintained, and kept by Defendant in the regular and ordinary course of business, I understand that Plaintiff's residential address was located in Citrus Heights, California throughout the course of her employment with Defendant.

Dated: October 13, 2022

Danielle Clark

DANIELLE CLARK